



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

September 25, 2020

BY ELECTRONIC MAIL

The Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Parker H. Petit and William Taylor, 19 Cr. 850 (JSR)**

Dear Judge Rakoff:

The Government and counsel for defendants Parker H. Petit and William Taylor jointly and respectfully write to propose an agreed-upon schedule governing pre-trial matters in the above-captioned case. The parties respectfully request that the Court adopt the proposed schedule.

Ten weeks before trial: Government expert disclosures due.

Seven weeks before trial: Defense expert disclosures due.
Government Rule 404(b) notice due.

Five weeks before trial
(and promptly with respect to
such material obtained less than
five weeks before trial): Defense produces all Rule 16 material in its possession.
Defense produces all Rule 17(c) material in its possession,
that it may seek to offer or otherwise use at trial.
Note 1 - Defense will not offer or otherwise use at trial any
material it receives in response to a Rule 17(c) subpoena
that it does not produce to the Government.
Note 2 - The Government reserves the right to litigate
whether all material received by the defense in response to
Rule 17(c) subpoenas should be produced to the
Government pursuant to Rule 16 or other authority

The Honorable Jed S. Rakoff
September 25, 2020
Page 2 of 2

- 35 days before trial: Subject to the Government's receipt of signed reasonable authenticity and/or business records stipulations, or agreement in principle on such stipulations, Government produces:
- Government witness list; and
 - Giglio and Jencks Act material.
- 30 days before trial: Government produces its exhibits.
Defense provides notice of any advice of counsel defense that either defendant may assert at trial.
- Three weeks before trial: Deadline for the parties' filing of motions *in limine*.
- Two weeks before trial: Defense produces:
- Defense witness list;
 - Defense exhibits, including (a) non-impeachment exhibits to be offered through Government witnesses, or otherwise during Government's case-in-chief, and (b) any exhibits to be offered in the defense case; and
 - all Rule 26.2 materials

Respectfully submitted,

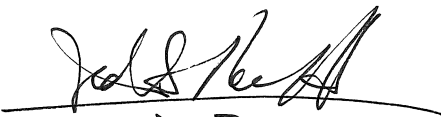
AUDREY STAUSS
Acting United States Attorney
Southern District of New York

By: /s/
Edward Imperatore/Scott Hartman/
Daniel Tracer
Assistant United States Attorneys
Southern District of New York
(212) 637-2327/2527/2329

cc: Counsel of Record (via electronic mail)

Approved.

SO ORDERED


JSD
9-25-20